

**REPORTS ANALYSIS REFERRAL****TO****OFFICE OF GENERAL COUNSEL****DATE: May 1, 2008****ANALYST: Quy Vuong**

**I. COMMITTEE:** Republican Party of Minnesota  
C00001313  
Anthony G. Sutton, Treasurer (3/19/07 – Present)  
Marina Taubenberger, Treasurer (5/8/02 – 3/18/07)  
525 Park Street, Suite 250  
St. Paul, MN 55103

**II. RELEVANT STATUTE:** 2 U.S.C. §441i(b)  
11 C.F.R. §100.24  
11 C.F.R. §100.26  
11 C.F.R. §106.7(f)

**III. BACKGROUND:**

**Summary: Receipt of Apparent Excessive Transfers from Non-Federal Account for Allocable Activity and Failure to Clarify Disbursements for Apparent Public Communications**

The Republican Party of Minnesota ("the Committee") disclosed \$1,259,578.74 in apparent excessive transfers from its non-federal account for allocable Administrative activity disclosed on the Amended 2006 12 Day Pre-General, Amended 2006 30 Day Post-General, and Amended 2006 Year End Reports (Attachment 2). In addition, the Committee failed to clarify whether disbursements for apparent public communications totaling \$534,702.91 on the Amended 2006 30 Day Post-General Report meet the definition of Federal Election Activity ("FEA"), expressly advocate the election or defeat of a clearly identified federal candidate, or qualify as exempt party activity.

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## **Apparent Excessive Transfers from Non-Federal Account for Allocable Activity**

### **12 Day Pre-General Report**

On February 26, 2007, the Committee filed an Amended 2006 12 Day Pre-General Report covering the period from October 1, 2006 through October 18, 2006. Schedule H3 supporting Line 18(a) (Transfers from Non-Federal Account for Allocated Activity) of the Detailed Summary Page disclosed transfers from the Committee's non-federal account totaling \$150,000.00 for the non-federal portion of allocable Administrative expenses (Images 27930171469-71). However, Schedule H4 supporting Line 21(a)(ii) (Non-Federal Share of Allocated Federal/Non-Federal Operating Expenditures) of the Detailed Summary Page disclosed only \$42,233.66<sup>1</sup> in disbursements for the non-federal portion of allocable Administrative expenses (Images 27930171472-85).

### **30 Day Post-General Report**

On February 21, 2007, the Committee filed an Amended 2006 30 Day Post-General Report covering the period from October 19, 2006 through November 27, 2006. Schedule H3 supporting Line 18(a) (Transfers from Non-Federal Account for Allocated Activity) of the Detailed Summary Page disclosed transfers from the Committee's non-federal account totaling \$1,191,924.40 for the non-federal portion of allocable Administrative expenses (Images 27930161554-62). However, Schedule H4 supporting Line 21(a)(ii) (Non-Federal Share of Allocated Federal/Non-Federal Operating Expenditures) of the Detailed Summary Page disclosed only \$69,591.32<sup>2</sup> in disbursements for the non-federal portion of allocable Administrative expenses (Images 27930161563-99).

### **Year End Report**

On February 20, 2007, the Committee filed an Amended 2006 Year End Report covering the period from November 28, 2006 through December 31, 2006. Schedule H3 supporting Line 18(a) (Transfers from Non-Federal Account for Allocated Activity) of the Detailed Summary Page disclosed transfers from the Committee's non-federal account totaling \$71,211.48 for the non-federal portion of allocable Administrative expenses (Images 27950092672-73). However, Schedule H4 supporting Line 21(a)(ii) (Non-Federal Share of Allocated Federal/Non-Federal Operating Expenditures) of the Detailed Summary Page disclosed only \$41,732.16<sup>3</sup> in

<sup>1</sup> On the Amended 2006 12 Day Pre-General Report, received February 26, 2007, the Committee also disclosed a total of \$10,673.10 in disbursements on Schedule H4 for the non-federal portion of allocable fundraising expenses, hence the total non-federal amount of \$52,906.76 (\$42,233.66 plus \$10,673.10) for the reporting period listed in the Schedule H4 totals (Images 27930171484-85).

<sup>2</sup> On the Amended 2006 30 Day Post-General Report, received February 21, 2007, the Committee also disclosed a total of \$26,724.16 in disbursements on Schedule H4 for the non-federal portion of allocable fundraising expenses, hence the total of \$96,315.48 (\$69,591.32 plus \$26,724.16) for the reporting period listed in the Schedule H4 totals (Images 27930161598-99).

<sup>3</sup> On the Amended 2006 Year End Report, received February 20, 2007, the Committee also disclosed a total of \$2,058.13 in disbursements on Schedule H4 for the non-federal portion of allocable fundraising expenses, hence the total non-federal amount of \$43,790.29 (\$41,732.16 plus \$2,058.13) for the reporting period listed in the Schedule H4 totals (Image 27950092687).

disbursements for the non-federal portion of allocable Administrative expenses (Images 27930092674-87).

### **Failure to Clarify Disbursements for Apparent Public Communications**

#### **30 Day Post-General Report**

In its Amended 2006 30 Day Post-General Report, filed on February 21, 2007, the Committee disclosed disbursements totaling \$534,702.91 for "Communications consultant" (\$2,500.00) "GOTV phonebanks" (\$250,000.00), "GOTV self-mailer" (\$61,317.06), and "GOTV self-mailers" (\$220,885.85) on Schedule B supporting Line 30(b) (Federal Election Activity Paid Entirely With Federal Funds), which may be for public communications and would therefore require further disclosure (Images 27930161520, 27930161525, 27930161536-37).

#### **Commission Communications with the Committee**

On June 6, 2007, a Request for Additional Information ("RAI") was sent to the Committee referencing the Amended 2006 Year End Report, received February 20, 2007. Among other issues, the RAI asked for clarification regarding apparent excessive transfers totaling \$1,259,578.74 from the non-federal account disclosed on the Amended 2006 12 Day Pre-General Report, received February 26, 2007, Amended 2006 30 Day Post-General Report, received February 21, 2007, and Amended 2006 Year End Report, received February 20, 2007. The RAI recommended that the Committee immediately transfer the total excessive amount received by the federal account back to the non-federal account (Image 27039451450-51).

Also on June 6, 2007, an RAI was sent to the Committee referencing the Amended 2006 30 Day Post-General Report, received February 21, 2007. Among other issues, the RAI asked for clarification regarding disbursements totaling \$534,702.91 itemized on Schedule B for "Communications consultant," "GOTV self-mailer," "GOTV self-mailers," and "GOTV phonebanks" and, in addition, requested the identification of the candidate(s) if the activity was conducted on behalf of a federal candidate(s) (Image 27039451453-54).

On July 9, 2007, the Committee filed a Miscellaneous Electronic Submission ("Form 99") which stated "We are engaged in a thorough review of our financial activities during the time frame for these reports and anticipate filing amendments that will correct the issues raised" (Image 27930873284).

On July 13, 2007, the Reports Analysis Division ("RAD") Analyst called and left a message for Kathie Roberts, a Committee staff member in charge of filing federal reports. The Analyst informed Ms. Roberts that the Committee was being referred to the Office of General Counsel ("OGC") for failure to clarify whether disbursements disclosed on the Amended 2006 30 Day Post-General Report were on behalf of federal candidates and failure to clarify apparent excessive transfers-in from the non-federal account disclosed during a three month period. The Analyst explained that while the Committee filed a Form 99 on July 9, 2007, further clarification was necessary since the pending issues were not directly addressed (Attachment 3).

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On July 20, 2007, the Committee filed a Form 99 in response to the RFAI referencing the Amended 2006 30 Day Post-General Report, received February 21, 2007, which stated, "All memo information required for payment to individuals on Schedule B has been reported and no further memos are required. All transfers from the National Republican Senatorial Committee and Republican National Committee were used for administrative expenses and were not used to fund any exempt activities. All other issues are being addressed in our thorough review of our financial activities. And we anticipate filing some amendments that will correct the issues raised" (Image 27990338131).

Also on July 20, 2007, the Committee filed a Form 99 in response to the RFAI referencing the Amended 2006 Year End Report, received February 20, 2007, which stated, "Any necessary amendments the party makes will move loan interest payments to schedule B for line 26. All other issues are being addressed in our thorough review of our financial activities. And we anticipate filing some amendments that will correct the issues raised" (Image 27990337999).

On July 23, 2007, the RAD Analyst left a message for Ms. Roberts concerning the Committee's OGC referable issues on the Amended 2006 30 Day Post-General Report and Amended 2006 Year End Report. The Analyst acknowledged that the Committee anticipated filing amended reports, as stated on the Committee's Form 99's, received July 9, 2007 and July 20, 2007, and requested a time frame of when the Committee expected to file those amendments (Attachment 3).

On July 24, 2007, Ms. Roberts returned the RAD Analyst's call and stated she had filed two (2) Form 99's on July 20, 2007 in response to RFAI's referencing the Committee's Amended 2006 30 Day Post-General Report and Amended 2006 Year End Report respectively. The Analyst informed Ms. Roberts that she would be contacted if further information was needed (Attachment 3).

On July 30, 2007, the RAD Analyst left a message for Ms. Roberts stating that the two (2) Form 99's filed by the Committee on July 20, 2007 only addressed some of the issues on the Amended 2006 30 Day Post-General Report and Amended 2006 Year End Report, and that other issues still needed to be addressed and clarified (Attachment 3).

On August 3, 2007, Keith Davis, consultant for the Committee, called RAD Management. He stated that the Committee was undergoing an extensive audit and that it looked as though they would need to file amendments to several reports, but that it would be some time before the audit was actually complete. RAD Management told him that there were a few issues that required an immediate response for the 2006 election cycle; otherwise the Committee would be referred to OGC. RAD Management suggested that the Committee work with the RAD Analyst to get these issues resolved and once the audit is complete, file any additional amendments as required. Mr. Davis said that he would encourage the Committee to work with the RAD Analyst to resolve the pending referable issues (Attachment 3).

On August 7, 2007, a RAD Senior Analyst attempted to contact Ms. Roberts and was transferred to Angela Nielsen, the Committee's Finance Director, who informed the Senior Analyst that Ms. Roberts was no longer with the Committee. The RAD Senior Analyst

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informed Ms. Nielsen that the Committee still had outstanding issues that needed to be addressed and advised her to speak with the Committee's assigned RAD Analyst regarding these specific issues. Ms. Nielsen responded by saying an accountant had already contacted RAD Management about the Committee's current internal audit. The RAD Senior Analyst stated that the Committee still needed to respond to the OGC referable matters. The RAD Senior Analyst requested a timetable of when the Committee would be able to respond and Ms. Nielsen said she would have the Committee's attorney contact RAD Management (Attachment 3).

On August 28, 2007, the RAD Analyst attempted to contact Ms. Nielsen regarding the status of the Committee's responses to the OGC referable matters on the Amended 2006 30 Day Post-General and Amended 2006 Year End Reports; however, a receptionist answered and stated that Ms. Nielsen was not available (Attachment 3).

Subsequently on August 28, 2007, Ms. Nielsen returned the RAD Analyst's call and stated that the Committee had spoken with RAD Management regarding the Committee's current situation and that amendments would be filed as soon as the internal audit was completed. The RAD Analyst informed Ms. Nielsen that a consultant representing the Committee had contacted RAD Management and had agreed that the Committee would be able to respond to the OGC referable issues as a matter of priority. The RAD Analyst told Ms. Nielsen that there were disbursements on the Amended 2006 30 Day Post-General Report that appeared to be public communications that needed further clarification. Ms. Nielsen said she would respond to this issue by filing a Form 99. The RAD Analyst also informed Ms. Nielsen that clarification was needed for apparent executive transfers from the non-federal account disclosed on the Amended 2006 12 Day Pre-General, 30 Day Post-General, and Year End Reports. Ms. Nielsen responded that the Committee's lawyers advised the Committee not to take any further action until its finances were in order upon completion of the internal audit (Attachment 3).

On November 16, 2007, the RAD Analyst attempted to contact Ms. Nielsen regarding the status of the Committee's response to the OGC referable issues on the Amended 2006 30 Day Post-General Report and Amended 2006 Year End Report. The Analyst left a message for Ms. Nielsen stating that a response was needed by November 23, 2007, or the matter would be turned over to the Office of General Counsel (Attachment 3).

On March 31, 2008, the RAD Analyst contacted Ms. Nielsen in regards to the OGC referable issues on the Committee's 2006 Amended 30 Day Post-General and Year End Reports. The RAD Analyst informed Ms. Nielsen that the issues are still referable to OGC and requested an update regarding the Committee's internal audit and a time frame of when the issues would be addressed. Ms. Nielsen informed the RAD Analyst that the Committee has a scheduled conference call for later in the afternoon to address all their issues and anticipated filing amended reports by the end of the week. Ms. Nielsen said she would contact the RAD Analyst after the conference call to update him on the status of the Committee and its filings (Attachment 3).

Later on March 31, 2008, Ms. Nielsen called to inform the RAD Analyst that the Committee will begin filing amended reports dating back to 2002 starting on Wednesday, April

2, 2008. Ms. Nielsen told the RAD Analyst that the OGC referable issues on the 2006 Amended 30 Day Post-General and Year End Reports will be addressed in the amended reports, and if they are not, to please call her back and she would address the matter. The RAD analyst informed Ms. Nielsen that upon receiving and reviewing the reports, she may be contacted about further issues (Attachment 3).

On April 9, 2008, Ms. Nielsen called to inform the RAD Analyst that the committee was having difficulty filing amendments to past reports and was working with a specialist from the FEC Electronic Filing Office to resolve the issues.

To date, no further communication has been received from the Committee regarding this matter.

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REPUBLICAN PARTY OF MINNESOTA  
Lubenberger, Marina  
FILING FREQUENCY: MONTHLY

525 PARK STREET

ST PAUL

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MN 55103

ID #C00001313

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| NS       |          |    | T   | 2/17/2005  | 1   | 25880073052 |                       |          |          |          |          |          |
| NS       |          |    | T   | 3/07/2003  | 1   | 25880138008 |                       |          |          |          |          |          |
| NS       |          |    | T   | 3/08/2005  | 1   | 25880413348 |                       |          |          |          |          |          |
| NS       |          |    | T   | 3/24/2005  | 1   | 25880295372 |                       |          |          |          |          |          |
| NS       |          |    | T   | 7/13/2005  | 1   | 25870585428 |                       |          |          |          |          |          |
| NS       |          |    | T   | 9/20/2005  | 1   | 25871055120 |                       |          |          |          |          |          |
| NS       |          |    | T   | 11/28/2005 | 1   | 25871852457 |                       |          |          |          |          |          |
| NS       |          |    | T   | 3/08/2006  | 1   | 26870085402 |                       |          |          |          |          |          |
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| R2       | M3       | 2  |     | 6/28/2005  | 5   | 25038831039 | 2/01/2005 2/28/2005   |          |          |          |          |          |
| R2       | M4       | 2  |     | 6/28/2005  | 4   | 25038831035 | 3/01/2005 3/31/2005   |          |          |          |          |          |
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| R2       | M5       | 2  |     | 7/06/2005  | 4   | 25038832123 | 4/01/2005 4/30/2005   |          |          |          |          |          |
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| R2       | M6       | 2  |     | 7/20/2005  | 3   | 25038851836 | 5/01/2005 5/31/2005   |          |          |          |          |          |
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| R2       | M7       | 2  |     | 9/02/2005  | 4   | 25038851880 | 6/01/2005 6/30/2005   |          |          |          |          |          |
| R2       | M10      | 2  |     | 11/16/2005 | 5   | 25038824062 | 9/01/2005 9/30/2005   |          |          |          |          |          |
| R2       | M12      | 2  |     | 5/02/2007  | 4   | 27039434452 | 11/01/2005 11/30/2005 |          |          |          |          |          |
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REPUBLICAN PARTY OF MINNESOTA  
subenberger, Marina  
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525 PARK STREET

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| RQ       | N5       | 2  |     | 5/02/2007  | 4   | 27039435808 | 4/01/2006 4/30/2006   |          |          |          |          |          |
| RQ       | N6       | 2  |     | 5/02/2007  | 4   | 27039436488 | 5/01/2006 5/31/2006   |          |          |          |          |          |
| RQ       | N7       | 2  |     | 5/02/2007  | 4   | 27039434472 | 6/01/2006 6/30/2006   |          |          |          |          |          |
| RQ       | N9       | 2  |     | 12/15/2006 | 3   | 26039311835 | 8/01/2006 8/31/2006   |          |          |          |          |          |
| RQ       | N10      | 2  |     | 1/24/2007  | 7   | 27039350824 | 9/01/2006 9/30/2006   |          |          |          |          |          |
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| RQ       | 12G      | 2  |     | 1/24/2007  | 5   | 27039350818 | 10/01/2006 10/18/2006 |          |          |          |          |          |
| RQ       | 12G      | 2  |     | 5/02/2007  | 5   | 27039434488 | 10/01/2006 10/18/2006 |          |          |          |          |          |
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| 3        | N3       | N  | P   | 3/08/2005  | 105 | 25990195008 | 2/01/2005 2/28/2005   | 37491    | 447739   | 283341   | 191889   | 50000    |
| 3        | N3       | A  | P   | 7/13/2005  | 115 | 25970585718 | 2/01/2005 2/28/2005   | 37491    | 447739   | 283341   | 191889   | 50000    |
| 3        | N3       | A  | P   | 2/20/2007  | 114 | 27950089944 | 2/01/2005 2/28/2005   | 129233   | 447739   | 283341   | 293820   | 50000    |
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| 3        | N5       | N  | P   | 5/20/2005  | 107 | 25990699758 | 4/01/2005 4/30/2005   | 397858   | 300235   | 427585   | 270307   | 0        |



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REPUBLICAN PARTY OF MINNESOTA  
Guttenberger, Marina  
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525 PARK STREET

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ID #C00001313

| ORN TYPE | RPT TYPE | AI | PGI | REC DATE   | PGS | BEG INAGE   | COVERAGE DATES |            | BEG CASH | RECEIPTS | DISBURSE | END CASH | DEBTS BY |
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| 3        | N7       | A  | P   | 8/15/2005  | 79  | 25970660138 | 6/01/2005      | 6/30/2005  | 6047     | 204324   | 188511   | 43861    | 0        |
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| 3        | N7       | A  | P   | 2/20/2007  | 79  | 27930154854 | 6/01/2005      | 6/30/2005  | 448595   | 204324   | 188511   | 43861    | 0        |
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| 3        | N8       | A  | P   | 2/20/2007  | 102 | 27930154854 | 7/01/2005      | 7/31/2005  | 488409   | 335748   | 280555   | 581601   | 0        |
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| 3        | N11      | N  | P   | 11/18/2005 | 112 | 25970660138 | 10/01/2005     | 10/31/2005 | 277838   | 277838   | 277838   | 581601   | 0        |
| 3        | N11      | A  | P   | 2/20/2007  | 111 | 27930154854 | 10/01/2005     | 10/31/2005 | 277838   | 277838   | 277838   | 581601   | 0        |
| 3        | N12      | N  | P   | 12/19/2005 | 119 | 25970660138 | 11/01/2005     | 11/30/2005 | 49510    | 238101   | 280084   | 34528    | 0        |
| 3        | N12      | A  | P   | 2/20/2007  | 116 | 27930154854 | 11/01/2005     | 11/30/2005 | 581601   | 238101   | 281948   | 581601   | 0        |
| 3        | YE       | N  | P   | 1/19/2006  | 108 | 25970660138 | 12/01/2005     | 12/31/2005 | 34528    | 301778   | 220853   | 115851   | 0        |
| 3        | YE       | A  | P   | 2/20/2007  | 105 | 27930154854 | 12/01/2005     | 12/31/2005 | 522834   | 301778   | 205783   | 618630   | 0        |
| 3        | N2       | N  | P   | 2/10/2006  | 86  | 25970660138 | 1/01/2006      | 1/31/2006  | 116851   | 220385   | 255011   | 81005    | 0        |
| 3        | N2       | A  | P   | 4/17/2006  | 87  | 25970660138 | 1/01/2006      | 1/31/2006  | 116851   | 220385   | 255011   | 81005    | 0        |
| 3        | N2       | A  | P   | 2/20/2007  | 86  | 27930154854 | 1/01/2006      | 1/31/2006  | 318930   | 220385   | 220385   | 581601   | 0        |
| 3        | N3       | N  | P   | 3/10/2006  | 123 | 25970660138 | 2/01/2006      | 2/28/2006  | 81005    | 628758   | 548537   | 161226   | 200000   |
| 3        | N3       | A  | P   | 3/14/2006  | 7   | 25970660138 | 2/01/2006      | 2/28/2006  | -        | -        | -        | -        | -        |
| 3        | N3       | A  | P   | 6/30/2006  | 126 | 25970660138 | 2/01/2006      | 2/28/2006  | 81005    | 628758   | 548537   | 161226   | 200000   |

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eubenberger, Marina  
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ST PAUL

PARTY QUALIFIED  
RM 55105

ID #C00001313

| ORR TYPE | RPT TYPE | AI | PGI | REC DATE   | PGS | BEG IMAGE   | COVERAGE DATES |            | BEG CASH | RECEIPTS | DISBURSE | END CASH | DEBTS BY |
|----------|----------|----|-----|------------|-----|-------------|----------------|------------|----------|----------|----------|----------|----------|
| 3        | H3       | A  | P   | 7/05/2006  | 3   | 28038104235 | 2/01/2006      | 2/28/2006  | -        | -        | -        | -        | -        |
| 3        | H3       | A  | P   | 2/22/2007  | 126 | 27930182409 | 2/01/2006      | 2/28/2006  | 589877   | 626758   | 548537   | 670098   | 200000   |
| 3        | H4       | N  | P   | 4/17/2006  | 129 | 28990085825 | 3/01/2006      | 3/31/2006  | 181226   | 421407   | 429874   | 152769   | 184937   |
| 3        | H4       | A  | P   | 6/30/2006  | 129 | 28930198095 | 3/01/2006      | 3/31/2006  | 181226   | 421407   | 429874   | 152769   | 184937   |
| 3        | H4       | A  | P   | 2/20/2007  | 127 | 27930182409 | 3/01/2006      | 3/31/2006  | 279301   | 321407   | 329874   | 789771   | 184937   |
| 3        | H5       | N  | P   | 3/18/2006  | 119 | 28990118875 | 4/01/2006      | 4/05/2006  | 152769   | 388758   | 429874   | 114773   | 174933   |
| 3        | H5       | A  | P   | 6/30/2006  | 119 | 28950203702 | 4/01/2006      | 4/30/2006  | 152769   | 388758   | 429874   | 114873   | 174933   |
| 3        | H5       | A  | P   | 2/20/2007  | 115 | 27930182409 | 4/01/2006      | 4/30/2006  | 709111   | 388758   | 379849   | 727249   | 174933   |
| 3        | H6       | N  | P   | 6/19/2006  | 119 | 28990151884 | 5/01/2006      | 5/31/2006  | 114873   | 354154   | 319830   | 149157   | 189846   |
| 3        | H6       | A  | P   | 3/30/2006  | 119 | 28940218451 | 5/01/2006      | 5/31/2006  | 114873   | 354154   | 319830   | 149157   | 189846   |
| 3        | H6       | A  | P   | 2/20/2007  | 114 | 27930158119 | 5/01/2006      | 5/31/2006  | 727249   | 354154   | 254052   | 827351   | 189846   |
| 3        | H7       | N  | P   | 7/20/2006  | 132 | 28990128877 | 8/01/2006      | 8/31/2006  | 139787   | 888885   | 888839   | 198781   | 159788   |
| 3        | H7       | A  | P   | 2/21/2007  | 188 | 27950087587 | 8/01/2006      | 8/31/2006  | 887831   | 848853   | 828780   | 847320   | 159788   |
| 3        | H8       | N  | P   | 8/18/2006  | 140 | 28948392489 | 7/01/2006      | 7/31/2006  | 155784   | 598455   | 268841   | 394438   | 154848   |
| 3        | H8       | A  | P   | 2/20/2007  | 133 | 27950092138 | 7/01/2006      | 7/31/2006  | 847388   | 598455   | 289535   | 1088416  | 154848   |
| 3        | H9       | N  | P   | 9/19/2006  | 149 | 28940331995 | 8/01/2006      | 8/31/2006  | 394408   | 810809   | 394948   | 810371   | 149518   |
| 3        | H9       | A  | P   | 1/18/2007  | 190 | 27940050425 | 8/01/2006      | 8/31/2006  | 394408   | 810809   | 394948   | 810371   | 149518   |
| 3        | H9       | A  | P   | 2/20/2007  | 190 | 27930193540 | 8/01/2006      | 8/31/2006  | 1088818  | 810809   | 394948   | 1582778  | 149518   |
| 3        | H10      | N  | P   | 10/14/2006 | 195 | 28990138888 | 9/01/2006      | 9/30/2006  | 289871   | 848884   | 888884   | 1198887  | 144380   |
| 3        | H10      | A  | P   | 2/20/2007  | 183 | 27930182788 | 9/01/2006      | 9/30/2006  | 1238788  | 848884   | 888884   | 2088888  | 144380   |
| 3        | H10      | A  | P   | 2/28/2007  | 185 | 27932171888 | 9/01/2006      | 9/30/2006  | 1882779  | 288881   | 488881   | 2088888  | 144380   |
| 3        | 128      | N  | P   | 10/28/2006 | 135 | 28940541112 | 10/01/2006     | 10/19/2006 | 1163327  | 834589   | 982767   | 1090409  | 144380   |
| 3        | 128      | A  | P   | 2/22/2007  | 126 | 27930182538 | 10/01/2006     | 10/18/2006 | 2083889  | 834589   | 888203   | 2238884  | 144380   |
| 3        | 128      | A  | P   | 2/28/2007  | 127 | 27930171383 | 10/01/2006     | 10/18/2006 | 2083889  | 834589   | 888703   | 2238884  | 144380   |
| 3        | 306      | N  | P   | 12/07/2006 | 287 | 28940808203 | 10/19/2006     | 11/27/2006 | 1000109  | 2037010  | 2805475  | 431844   | 133883   |
| 3        | 308      | A  | P   | 2/21/2007  | 880 | 27930181888 | 10/19/2006     | 11/27/2006 | 2238884  | 2037010  | 1888888  | 2988888  | 133883   |
| 3        | YE       | N  | P   | 1/19/2007  | 88  | 27940088818 | 11/28/2006     | 12/31/2006 | 481664   | 112526   | 887558   | 133814   | 128880   |
| 3        | YE       | A  | P   | 2/20/2007  | 95  | 27950092598 | 11/28/2006     | 12/31/2006 | 2932958  | 112526   | 293518   | 2751985  | 128880   |
| TOTAL    |          |    |     |            |     |             |                |            |          | 11282487 | 8848344  |          |          |

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utton, Anthony G  
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ST PAUL

PARTY QUALIFIED  
RN 55103

ID #C00001313

ORN TYPE RPT TYPE AI PGI REC DATE PGS DES IMAGE COVERAGE DATES BEG CASH RECEIPTS DISBURSE END CASH DEBTS BY

1 A 3/19/2007 5 27039403822  
1 A 5/14/2007 4 27090055581  
1 A 7/25/2007 4 27931069585

NS T 2/26/2007 1 27930171988  
NS T 6/05/2007 1 27930762142  
NS T 7/09/2007 1 27930672884  
NS T 7/20/2007 1 27990337888  
NS T 7/20/2007 1 27990338131  
NS T 10/15/2007 4 27931380759  
NS T 11/19/2007 1 27931588630  
NS T 1/31/2008 1 28990398556  
NS T 4/04/2008 1 28990781597

RQ N2 2 9/14/2007 3 27039528874 1/01/2007 1/31/2007  
RQ N4 2 9/14/2007 3 27039523082 3/01/2007 3/31/2007  
RQ N5 2 9/14/2007 6 27039523085 4/01/2007 4/30/2007  
RQ N6 2 9/14/2007 4 27039523081 5/01/2007 5/31/2007  
RQ N7 2 10/17/2007 3 27039556782 6/01/2007 6/30/2007  
RQ N8 2 10/17/2007 3 27039520779 7/01/2007 7/31/2007  
RQ N10 2 12/28/2007 3 27039580998 8/01/2007 8/30/2007  
RQ N11 2 12/28/2007 3 27039580402 10/01/2007 10/31/2007  
RQ N12 2 2/15/2008 3 28039634344 11/01/2007 11/30/2007  
RQ YE 2 3/05/2008 3 28039651683 12/01/2007 12/31/2007  
RQ N2 2 3/19/2008 4 28039860881 1/01/2008 1/31/2008  
RQ N3 2 4/23/2008 5 28039710609 2/01/2008 2/29/2008

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utton, Anthony G  
ILING FREQUENCY: MONTHLY

525 PARK STREET

ST PAUL

PARTY QUALIFIED  
NN 55103

ID #C00001313

| OWN TYPE | RPT TYPE | AJ | PGI | REC DATE   | PGS | BEG IMAGE   | COVERAGE DATES        | BEG CASH | RECEIPTS | DISBURSE | END CASH | DEBTS BY |
|----------|----------|----|-----|------------|-----|-------------|-----------------------|----------|----------|----------|----------|----------|
| 3        | H2       | N  | P   | 2/20/2007  | 75  | 27850078484 | 1/01/2007 1/31/2007   | 2751985  | 144421   | 218418   | 2679971  | 123268   |
| 3        | H3       | N  | P   | 3/12/2007  | 91  | 27850078484 | 3/01/2007 3/31/2007   | 2818991  | 203895   | 283222   | 2824204  | 117936   |
| 3        | H4       | N  | P   | 4/17/2007  | 122 | 27850078484 | 4/01/2007 4/30/2007   | 2838324  | 220870   | 2838324  | 2814835  | 112898   |
| 3        | H5       | N  | P   | 5/18/2007  | 160 | 27850078484 | 5/01/2007 5/31/2007   | 2818425  | 882862   | 1882862  | 2714168  | 107832   |
| 3        | H6       | N  | P   | 6/20/2007  | 191 | 27850078484 | 6/01/2007 6/30/2007   | 2714140  | 147752   | 283331   | 2852561  | 101858   |
| 3        | H7       | N  | P   | 7/20/2007  | 106 | 27850078484 | 7/01/2007 7/31/2007   | 2852561  | 117649   | 173038   | 2597173  | 96144    |
| 3        | H8       | N  | P   | 8/20/2007  | 96  | 27850078484 | 8/01/2007 8/31/2007   | 2587173  | 226478   | 157838   | 2884818  | 304758   |
| 3        | H9       | N  | P   | 9/20/2007  | 130 | 27850078484 | 9/01/2007 9/30/2007   | 2884818  | 511898   | 443834   | 2732878  | 337898   |
| 3        | H10      | N  | P   | 10/20/2007 | 88  | 27850078484 | 10/01/2007 10/31/2007 | 2732878  | 181418   | 113184   | 2771112  | 422979   |
| 3        | H11      | N  | P   | 11/20/2007 | 144 | 27850078484 | 11/01/2007 11/30/2007 | 2771112  | 416810   | 233782   | 2954160  | 292861   |
| 3        | H12      | N  | P   | 12/20/2007 | 52  | 27850078484 | 12/01/2007 12/31/2007 | 2954160  | 280186   | 155385   | 3076934  | 278784   |
| 3        | YE       | N  | P   | 1/31/2008  | 105 | 28980895328 | 12/01/2007 12/31/2007 | 3076934  | 198895   | 826014   | 2988875  | 288847   |
| 3        | H2       | N  | P   | 2/20/2008  | 84  | 28980895328 | 1/01/2008 1/31/2008   | 1988875  | 827721   | 827721   | 3288228  | 263870   |
| 3        | H3       | N  | P   | 3/20/2008  | 109 | 28980895328 | 2/01/2008 2/29/2008   | 3248228  | 848272   | 274822   | 3314848  | 263370   |
| 3        | H4       | N  | P   | 4/20/2008  | 96  | 28980895328 | 3/01/2008 3/31/2008   | 3323823  | 508824   | 200143   | 3830494  | 263370   |
| TOTAL    |          |    |     |            |     |             |                       |          |          | 4230541  | 3361298  |          |

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**Republican Party of Minnesota (C00001313)****Amended 2006 12 Day Pre-General Report/Amended 2006 30 Day Post-General Report/  
Amended 2006 Year End Report****Overview of Apparent Excessive Non-Federal Transfers**

| Report  | Schedule H3 for<br>Line 18a: Non-Federal<br>Transfers from<br>Account for<br>Allocated Activity | Schedule H4 for<br>Line 21: Non-Federal<br>Share of<br>Allocable<br>Administrative<br>Expenses | Apparent<br>Excessive<br>Amount |
|---|---|--|---------------------------------|
| 2006 Amended 12 Day<br>Pre-General Report,<br>received 2/26/2007  | \$150,000.00  | \$42,233.66  | \$107,766.34                    |
| 2006 Amended 30 Day<br>Post-General Report,<br>received 2/21/2007 | \$1,191,924.40  | \$69,591.32  | \$1,122,333.08                  |
| 2006 Amended Year End<br>Report, received<br>2/20/2007            | \$71,211.48   | \$41,732.16  | \$29,479.32                     |
|   |   |  |                                 |